IN THE UNITED STATES DISTRICT COURT FOR THE

WESTERN DISTRICT OF OKLAHOMA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
-vs-	)	Case No. CR-11-109-M
	)	
FARIDEH HEIDARPOUR,	)	
a/k/a Faraday Heidarpour,	)	
a/k/a Faraday Pour;	)	
ALI HEIDARPOUR; and	)	
A.B.C. BILLING, INC.,	)	
	)	
Defendants.	)	

MOTION FOR EXTENSION OF TIME

The plaintiff, United States of America, by Sanford C. Coats, United States Attorney for the Western District of Oklahoma, through Vicki Zemp Behenna, Assistant United States Attorney, requests the Court grant plaintiff an extension of 61 days up to and including January 31, 2012, within which to file its Notice of 404(b) Evidence and Notice of Coconspirator's Statements. Counsel for plaintiff would show the Court as follows:

1.   Notice of 404(b) Evidence and Notice of Coconspirator's Statements is presently due December 1, 2011;

2.   The undersigned needs additional time to review the evidence to determine what, if any, will be used for 404(b) evidence, and further to determine what coconspirator statements will be used for trial;

3.   No previous extension has been requested and this motion is not made for purposes of delay;

4.   Counsel for the defendants have been contacted and they have no objection to the requested extension; and

5.   The requested extension will not delay any deadlines, including the trial date, set by this Court in its Scheduling Order dated May 6, 2011.

WHEREFORE, plaintiff respectfully moves the Court for an extension of time until January 31, 2012, within which to file its Notice of 404(b) Evidence and Notice of Coconspirator's Statements.

Respectfully submitted,

SANFORD C. COATS
United States Attorney

s/VICKI ZEMP BEHENNA
Assistant U.S. Attorney
Bar Number: 10734
210 Park Avenue, Suite 400
Oklahoma City, Oklahoma 73102
(405) 553-8700 (Office)
(405) 553-8888 (Fax)
Vicki.Behenna@usdoj.gov

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2011, I electronically transmitted the attached document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants: Drew Neville, Kevin Krahl, John Gile.

s/VICKI ZEMP BEHENNA
Assistant U.S. Attorney